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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

FILED
2016 JUN 15 AM 10:54
WESTERN DISTRICT OF TEXAS
U.S. CLERK'S OFFICE
BY: 

UNITED STATES OF AMERICA

§

Cause No.

§

§

INDICTMENT

v.

§

§

[VIO: COUNT ONE: 8 U.S.C. § 1325(c)
and 18 U.S.C. § 371, Conspiracy to
Commit Marriage Fraud.]

NANCY CHAN

§

THE GRAND JURY CHARGES:

DR 16 CR 0819

COUNT ONE

[8 U.S.C. § 1325(c) & 18 U.S.C. § 371]

From on or about March 2, 2011, and continuing through the date of this indictment, in
the Western District of Texas, the Defendant,

NANCY CHAN,

a citizen of the United Kingdom and therefore an alien to the United States, did knowingly
combine, conspire, and agree with other persons known and unknown to the Grand Jury, to
unlawfully enter into marriage for the purpose of evading a provision of the immigration laws of
the United States, in violation of Title 8, United States Code, Section 1325(c) and Title 18,
United States Code, Section 371.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts
among others were committed within the Western District of Texas and elsewhere:

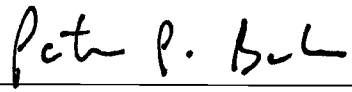
1. On or about March 2, 2011, in Maverick County, Texas, NANCY CHAN married
F.R. for the purpose of CHAN becoming a Lawfully Admitted Permanent Resident.

2. On May 25, 2011, in Eagle Pass, Texas, NANCY CHAN submitted an adjustment of status application to USCIS Chicago Lock Box via US Mail.
3. On November 26, 2013, in Austin, Texas, NANCY CHAN submitted an I-751 Petition to Remove Conditions on Residence, and associated filing fee, to USCIS Vermont Service Center via US Mail.
4. On October 15, 2014, in San Antonio, Texas, NANCY CHAN met with USCIS officials and discussed the validity of CHAN'S marriage to F.R.
5. On February 5, 2015, in San Antonio, Texas, NANCY CHAN met with USCIS and gave a sworn statement concerning the validity of CHAN'S marriage to F.R.
6. On July 8, 2015, CHAN sent F.R. text messages concerning the fraudulent marriage scheme and a pending interview of her husband with USCIS.

A TRUE BILL


FOREPERSON

RICHARD L. DURBIN, JR.
United States Attorney

By: 
PATRICK P. BURKE
Assistant United States Attorney

SEALED:
UNSEALED: XX

DR 16 CR 0819

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

COUNTY: Maverick USAO #: 2015R09613
DATE: June 15, 2016 MAG. CT. #:
AUSA: Patrick P. Burke
DEFENDANT: Nancy Chan
CITIZENSHIP: United Kingdom
INTERPRETER NEEDED: No LANGUAGE: N/A
DEFENSE ATTORNEY: None
ADDRESS OF ATTORNEY: N/A
DEFENDANT IS: Not detained DATE OF ARREST: N/A
BENCH WARRANT NEEDED: Yes
PROBATION OFFICER: N/A
NAME AND ADDRESS OF SURETY: N/A
YOUTH CORRECTIONS ACT APPLICABLE: No
PROSECUTION BY: Indictment
OFFENSE: (Code & Description): 8 U.S.C. § 1325(c) & 18 U.S.C. § 371, Conspiracy to Commit Marriage Fraud.
OFFENSE IS A: Felony
MAXIMUM SENTENCE: 5 years of imprisonment; up to \$250,000 fine; 3 years of supervised release; \$100 special assessment for each count of conviction.
PENALTY IS MANDATORY: Yes & No
REMARKS: See Above
W/DT-CR-3